

REMARKS

In response to the objection to the specification set forth at paragraph 1 of the Office Action, Applicants have revised the text to insert appropriate headings, and have made certain other revisions to conform with U.S. practice.

Claims 7-13 have been rejected under 35 U.S.C. §112, second paragraph, for failing to particularly point and distinctly claim the invention, based on the proposition that claim 7, being a method claim, depends from claim 1 which is an apparatus claim. In addition, claims 7-13 have been objected to on the grounds that one multiple dependent claim cannot depend from another multiple dependent claim. In response to these grounds of objection and rejection, Applicants note that claims 1-13 have been cancelled and new claims 14-23 entered in their place. The new claims contain neither hybrid claims nor multiple dependencies. Accordingly, reconsideration and withdrawal of these grounds of objection and rejection are respectfully requested.

Claims 1-3 and 5 have been rejected under 35 U.S.C. §102(e) as anticipated by CALAMVOKIS (US Patent No. 6,735,212), while claims 4 and 6 have been rejected under 35 U.S.C. §103(a) as unpatentable over CALAMVOKIS in view of CHESSMAN et al. (US 6,680,933). Applicants respectfully submit, however, that these grounds of rejection have been rendered moot by the cancellation of claims 1-13 and the submission of new claims 14-23. Moreover, for the reasons set forth hereinafter, Applicants respectfully submit that the new

claims 14-23 distinguish over the cited references, whether considered by themselves or in combination.

In order to facilitate the further examination of this application, Applicants note that new claim 14 is based on cancelled claim 1, but has been amended to incorporate features of the invention previously recited in claim 7. In addition, claims 15 and 16 are based on cancelled claims 10 and 11, while claim 17 is a method claim that corresponds in scope to apparatus claim 14. Finally, new claims 18-23 are based on cancelled claims 18-23.

New claims 14 and 17 require that each ingress means comprise an ingress schedule storing means for storing a plurality of transmission queue identities. Applicants respectfully submit that this feature on the invention is not found in CALAMVOKIS; and in particular, that none of the input ports 102 in CALAMVOKIS includes such a feature.

The Office Action indicates that elements 204-I, 306, 308 and 106 in CALAMVOKIS constitute such an ingress scheduling storing means, and refers in particular to col. 4, lines 50-60 regarding this feature. Applicants respectfully submit, however, that the components 204 (as indicated, for example, in Figure 2 of CALAMVOKIS, and discussed in the specification starting at col. 4, line 32) are processors that function as controllers to determine where cells should be saved in memory 202, as indicated, for example, at col. 4, lines 41-42. Thus, the function of the processors 204 in CALAMVOKIS differs fundamentally from the

limitations of claim 14, and they do not perform the function of storing transmission queue identities.

The elements 306 and 308 (as shown in Fig. 3 of CALAMVOKIS and discussed in the specification at col. 5, lines 28 and beyond), on the other hand, are a port controlled unit and a queue information memory, respectively. (See col. 5, lines 30-31.) From the discussion at col. 5, lines 37-40, it appears that the port control unit 306 is a processor which controls the behavior at a port, and thus is not a schedule. As regards to the memory 308, at lines 40-42 of col. 5, CALAMVOKIS indicates that this element holds requests for every queue associated with a port, not a plurality of transmission queue identities.

Finally, the scheduler 106 also does not constitute an ingress schedule storing means, such as recited in claim 14, since the latter requires that each ingress schedule storing means be a part of an ingress means. In CALAMVOKIS, the scheduler 106 is separate from the input ports (ingress means) which it controls. (See col. 3, lines 66-67.) Nor is an ingress scheduler storing means described in the text of the specification at col. 4, lines 50-60 referred to at the bottom of page 4 in the Office Action. Rather, this portion of the disclosure in CALAMVOKIS simply describes functions performed by the processor 204-I, when cells traverse the switch core.

In addition to the foregoing, CALAMVOKIS also does not teach or suggest that each egress means includes an egress schedule storing means for storing a plurality of ingress identities, as is also recited in new claims 14 and 17.

Although the Office Action suggests that the scheduler 106 in CALAMVOKIS is such an egress scheduler, Applicants note that the latter is a separate entity from the egress ports, and is used to instruct the ports. Accordingly, it cannot constitute an egress schedule as recited in claim 14.

The Office Action also suggests that the element 204-O (output port processor) in CALAMVOKIS constitutes an egress schedule such as recited in claim 14. However, the specification indicates at col. 5, lines 10-21 that the component 204-O is a processor for controlling a destination port. There is nothing in the disclosure that would suggest that this element is a schedule storing a plurality of ingress identities. In this regard, Applicants note that the disclosure at col. 3, lines 47-55 in CALAMVOKIS states that the ports 102 "may have shallow...queues in both ingress and egress direction." However, as noted previously, a queue, as such, is not the same as a schedule storing a plurality of ingress identities. Accordingly, this section of this portion of the disclosure does not suggest that the processor 204 is a schedule storing a plurality of ingress identities.

Finally, the last paragraph on page 4 of the Office Action suggests that the disclosure at col. 4, lines 50-60 of CALAMVOKIS discloses an egress schedule storing means. However, as mentioned previously, this narrative describes functions performed by the processors when the cells traverse the switch core. Accordingly, it does not teach or suggest that an egress schedule storing means

stores identities of ingress means addresses from which data are to be received, as recited in claim 14.

For the reasons indicated above, Applicants respectfully submit that CALAMVOKIS neither teaches nor suggests a switching arrangement or a routing method, such as recited in independent claims 14 and 17 in which each ingress means includes an ingress schedule storing means for storing a plurality of transmission queue identities, and each egress means includes an egress schedule storing means for storing a plurality of ingress identities. It follows, therefore, that there is also no disclosure of a card for transmitting configuration primitives for updating such ingress and egress schedule storing means. Similarly, no simple combination of CALAMVOKIS and CHEESMAN could result in the system or method such as recited in the claims of the present application, which includes ingress pointer means referencing transmission queue identities stored in an ingress schedule, or egress pointer means for referencing ingress identities, stored in an egress schedule, as recited in the claims.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and

Serial No. 09/898,484

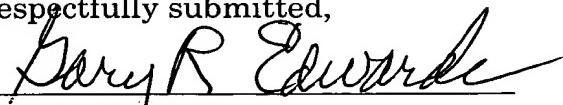
Amendment Dated: May 9, 2005

Reply to Office Action of December 8, 2004

please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #038819.50061).

May 9, 2005

Respectfully submitted,


Gary R. Edwards
Gary R. Edwards
Registration No. 31,824

CROWELL & MORING LLP
Intellectual Property Group
P.O. Box 14300
Washington, DC 20044-4300
Telephone No.: (202) 624-2500
Facsimile No.: (202) 628-8844

GRE:pct
374939